

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

(Title of Action)

^M
DR. BEVERLEY HARRIS

Plaintiff, :

Civil Action No. 2:18-cv-10277-MCA-SCM

v. :

THE BOZZUTO GROUP
Defendant. :

NOTICE OF MOTION

PLEASE TAKE NOTICE

DR. BEVERLEY M HARRIS

(Name of Moving Party)

will move before the Honorable _____, U.S.D.J. on

(Motion days are the 1st and 3rd Monday of each month)

for an Order TO OBTAIN KEY FOR EQUIPMENT ROOM IN HER APARTMENT
(describe type of relief being sought)

In support of my motion, I will rely on the attached brief (if necessary).

DR. BEVERLEY M HARRIS

Name

610 GREENWAY BLVD
ROSELLE, NJ 07203

Address

Date:

6/14/18

Dr. [Signature]

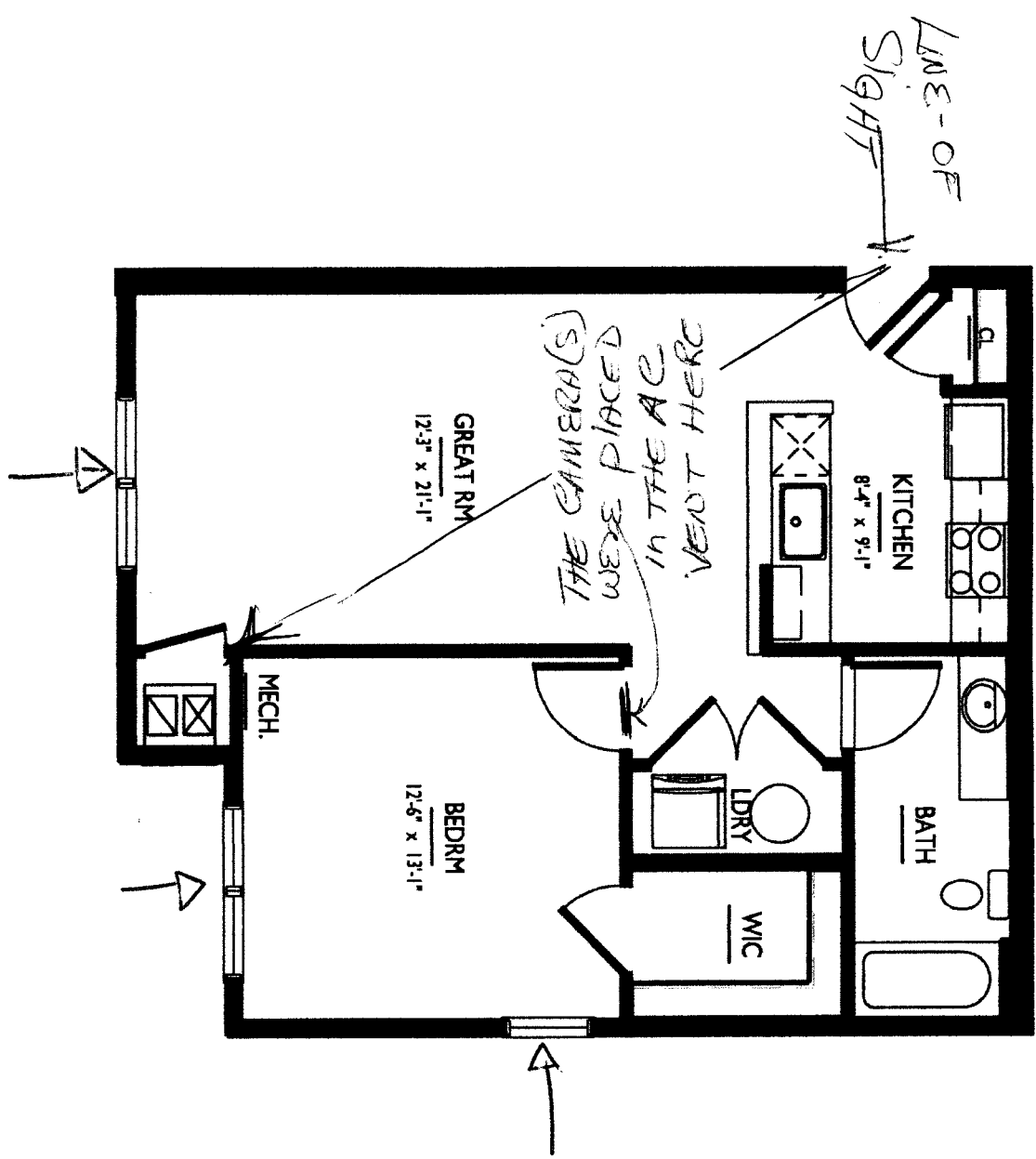
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DISTRICT OF NEW JERSEY
U.S. DISTRICT COURT

Case # 2:18-cv-10277-MCA-SCM



apt type: A



Elevations and floor plans are an artist's rendering and are shown for illustration purposes only. All square feet are approximate.

THE UNITED STATES DISTRICT COURT OF NEW JERSEY

June 11, 2018

Dr. Beverley M. Harris

Plaintiff

v.

Mr. Thomas S. Bozzuto, Founder of the Bozzuto Group

Mr. Toby Bozzuto, Operatng Officer, Bozzuto Group

Partners of the Bozzuto Group

Mr. David Curcio, Regional Manager, The Park Apartments

Ms. Michelle Demetriou, Manager The Park Apartments

Roselle New Jersey

Defendants

CASE NUMBER: 2:18-CV-
10277-MCA-SCM

JURY TRIAL

Pauperis Filing

MOTION BRIEF

Plaintiff, Dr. Beverley M. Harris, representing herself, *per se*, kindly motions the Court for the following relief:

On 5 June 2018 Plaintiff, file suit against the Bozzuto Group, and other Defendants, cause of action:

1. **New Jersey law, negligence**, based on various tenant rights violation
2. Violation of 28 U.S.C. § 2511 & Invasion of Privacy, based on Plaintiff discovered that Defendants illegally installed camera(s) in the air condition vent in Plaintiff's apartment. Plaintiff discovered the camera(s) when she heard unusual sounds in the apartment. Plaintiff is now hearing similar sounds coming from a locked equipment room and believes that there might be more recording/camera devices in the equipment room. Furthermore, Defendants have been making every effort, through bullying, intimidation, and threats of eviction in order to access my apartment, without cause.
3. Therefore, Plaintiff is kindly motioning the Court for an Order to obtain the key to the equipment room in Plaintiff's apartment in order to check for recording and/or other illegally installed devices in the apartment.
4. Plaintiff will allow Defendants to observe, from the hallway outside the Plaintiff's door which has clear view of the equipment room door. Plaintiff will not enter the equipment

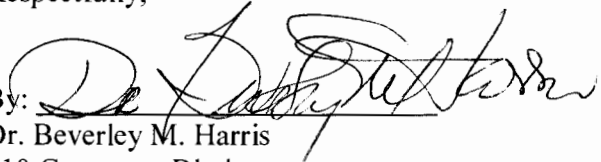
THE UNITED STATES DISTRICT COURT OF NEW JERSEY

June 11, 2018

room or touch and/or damage any item in that area. Plaintiff will only be looking into the room for any unusual items that make looking like recording items.

DATED: 11 June 2018

Respectfully,

By: 
Dr. Beverley M. Harris
610 Greenway Blvd
Roselle, NJ 07203
Phone: (973) 876-0933